

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No. 8:22-CR-199 (MAD)
)	
v.)	STIPULATION AND ORDER
)	FOR CONTINUANCE
SIMRANJIT SINGH,)	
)	
)	
Defendant.)	

Lee Kindlon, Esq., the attorney for Simranjit Singh having moved for a continuance of 60 days within which the parties may complete discovery, file motions and prepare for trial in the above-captioned action and Carla B. Freedman, United States Attorney for the Northern District of New York, Jeffrey C. Stitt, Assistant U.S. Attorney, appearing, having consented to the continuance and proposed the exclusion of the additional 60 period of continuance under the Speedy Trial Act, the parties hereby stipulate and agree as follows:

- 1) The prior proceedings in this case occurred as follows:
 - a) Date of initial appearance or arraignment: March 31, 2023
 - b) Date of indictment: June 8, 2022
 - c) Defendant custody status: in custody.
 - i) Date United States moved for detention: March 31, 2022
 - ii) Date of detention hearing: waived.
 - iii) Date detention decision issued: April 6, 2023
- 2) The Court previously ordered the following exclusions under the Speedy Trial Act: The time from April 21, 2023 up to and including June 19, 2023 has been excluded.
- 3) Simranjit Singh has requested the continuance based on the following facts and circumstances:

a) The parties need to engage in discovery disclosures which require time for counsel to review and make an informed decision on how to proceed. Additionally, the defendant obtained new counsel and the parties need additional time to discuss this matter.

4) The parties stipulate and agree that the ends of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial because disclosures are ongoing and the parties have not had appropriate time to discuss how the case may proceed—either with a change of plea or with motions and a trial, taking into account the exercise of due diligence pursuant to 3161(h)(7)(B)(iv)

5) The parties stipulate and agree that a period of 60 days beginning on and including the date on which the Court signs the requested order shall be excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B).

The undersigned attorneys affirm under penalty of perjury the accuracy of the facts set forth above and apply for and consent to the proposed order set forth below.

Dated: June 13, 2023

CARLA B. FREEDMAN
United States Attorney

By: /s/Jeffrey C. Stitt
Jeffrey C. Stitt
Assistant United States Attorney
Bar Roll No. 520195

Lee C. Kindlon
Lee Kindlon, Esq.
Attorney for Simranjit Singh
Bar Roll No.

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ORDER

A. The Court incorporates into this Order the stipulated facts set forth above and hereby adopts them as findings.

B. The Court has considered its obligation under 18 U.S.C. § 3161(h)(7)(A) to determine whether a continuance serves the ends of justice in a manner that outweighs both the public interest and the defendant's rights. The Court finds that pursuant to 18 U.S.C. § 3161(h)(7)(A), the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendants in a speedy trial because:

1. this delay is necessary in order to allow the parties the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

BASED ON THE STIPULATED FACTS AND THE COURT'S RELATED FINDINGS
IT IS HEREBY ORDERED:

A. A period of 60 days, beginning on and including the date of this Order shall be excludable in computing time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

B. The deadline for the completion of discovery by the United States (otherwise due within 14 days of arraignment pursuant to the terms of the Local Rules of Criminal Procedure and the

Criminal Pretrial Order) will be extended by 60 days to _____. The deadline for the completion of reciprocal discovery by the Defendant(s) (otherwise due within 21 days of arraignment pursuant to the terms of the Local Rules of Criminal Procedure and the Criminal Pretrial Order) will be extended by 60 days to _____.

C. Any pretrial motions in this case shall be filed on or before _____ and shall be made returnable on _____.

D. The trial in this matter shall begin on _____ before United States District Judge Mae A. D'Agostino in Albany, New York or, in the alternative, a change of plea shall be entered on or before _____.

IT IS SO ORDERED.

Dated and entered this _____ day of June, 2023.

Hon. Mae A. D'Agostino
United States District Judge